

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED.

Defendant.

Case No. 2:23-CV-00449-JRG

**DEFENDANT LENOVO GROUP LIMITED'S UNOPPOSED MOTION FOR EXPEDITED
BRIEFING ON MOTION TO AMEND DOCKET CONTROL ORDER (DKT. 169)**

Defendant Lenovo Group Limited (“LGL”) files this Unopposed Motion for Expedited Briefing on Motion to Amend the First Amended Docket Control Order (Dkt. No. 169) and would respectfully show the Court as follows:

On July 17, 2025, LGL filed its Opposed Motion to Amend First Amended Docket Control Order (“Motion to Amend”) (Dkt. No. 169). The current deadline for Plaintiff Universal Connectivity Technologies Inc. (“UCT”) to file its Response to LGL’s Motion to Amend (“Response Brief”) is July 31, 2025. *See* Local Rule CV-7(e). LGL requests that the Court expedite the briefing schedule on LGL’s Motion to Amend and order that UCT file its Response Brief on or before July 24, 2025, and neither party is permitted any further briefing. *Id.* (“Any party may separately move for an order of this court ... shortening the [briefing schedule].”).

LGL represents that good cause exists for expediting the briefing schedule on LGL’s Motion to Amend. UCT recently served its Final Infringement Contentions under P.R. 3–1. *See* Dkt. 149 at 4. “The purpose of P.R. 3–1 infringement is to provide reasonable notice to an accused infringer of the accused products.” Dkt. No. 115 at 2. “This notice allows the accused infringer to conduct its discovery and prepare its defenses.” *Id.* As set forth in more detail in LGL’s Motion to Amend, LGL has been prejudiced by UCT’s delay in producing adequate infringement contentions such that LGL could adequately prepare its claims and defenses in this matter. In its Motion to Amend, LGL seeks to amend the deadlines in order for LGL to have time to continue to prepare its claims and defenses in light of UCT’s newly disclosed infringement contentions.

At this time, important substantive deadlines in this matter are quickly approaching. The deadline to Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof is August 1, 2025. Dkt. 149 at 3. The deadline to Serve Disclosures for Rebuttal Expert Witnesses is August 29, 2025. *Id.* And the Deadline to Complete Expert Discovery is September 12, 2025. *Id.*

Given the foregoing, the expedited briefing on LGL's Motion to Amend will ensure that the briefing on the Motion to Amend is completed prior to the August 1, 2025, deadline to Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof and other important substantive deadlines, while affording the Court time to make its ruling on LGL's Motion to Amend. *See Fractus, S.A. v. Verizon Comms. Inc.*, No. 2:18-cv-00135-JRG, Dkt. No. 496, at *1 (E.D. Tex. July 3, 2019) (granting expedited briefing on Partially Opposed Renewed Motion to Amend Docket Control Order).

Counsel for LGL met and conferred with counsel for UCT to discuss the substantive relief sought in this Motion in accordance with Local Rule CV-7(h), and counsel for UCT indicated that UCT does not oppose the relief sought in this Motion.

Accordingly, LGL respectfully requests that the Court grant this Unopposed Motion and enter an order requiring UCT to file its Response Brief on or before July 24, 2025.

Dated: July 17, 2025

Respectfully Submitted,

/s/ Steven D. Moore

Steven D. Moore

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2025, all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ Steven D. Moore

Steven D. Moore

CERTIFICATE OF CONFERENCE

Counsel for both parties have complied with the meet and confer requirements of Local Rule CV-7(h). In particular, counsel for Defendant, including lead counsel Steve Moore and local counsel Melissa Smith, met and conferred with counsel for Plaintiff, including lead counsel Brett Cooper and local counsel Garrett Parish, regarding the issues raised herein on July 17, 2025. Counsel for UCT indicated that UCT is not opposed to the relief sought in this Motion.

/s/ Steven D. Moore

Steven D. Moore